

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireless E911 Location Accuracy	)	PS Docket No. 07-114
Requirements	)	
	)	
	)	

To:    The Commission

**EXCLUSION REPORT  
TMP CORPORATION d/b/a  
SIMMETRY WIRELESS**

TMP Corporation d/b/a Simmetry Wireless (“Simmetry”), pursuant to section 20.18(h)(1)(vi) of the Rules and Regulations of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> and the Order released June 28, 2011 in the above-referenced docket,<sup>2</sup> hereby notifies the Commission of the exclusion of certain areas from compliance with the network-based E911 Phase II location accuracy standards.<sup>3</sup> Simmetry is a Tier III cellular carrier providing service in rural Illinois and Missouri. Simmetry provides service pursuant to licenses held in its own name, and those of its licensing holding affiliate, TMP Jacksonville, LLC. Simmetry uses a network-based solution to implement Phase II E911 on its Global System for Mobile Communications (“GSM”) system.

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<sup>1</sup> 47 C.F.R. § 20.18(h)(1)(vi).

<sup>2</sup> *In re Wireless E911 Location Accuracy Requirements*, Order, DA 11-1125 (rel. June 28, 2011) (“*Exclusion Report Order*”) (providing clarification and extending the filing deadline to July 28, 2011).

<sup>3</sup> Copies of this Exclusion Report are being sent to the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, and the National Association of State 9–1–1 Administrators pursuant to the *Exclusion Report Order* and rule 20.18(h)(1)(vi).

Simmetry is excluding the following counties:

Cass, IL  
Hancock, IL  
Lewis, MO  
McDonough, IL  
Pike, IL  
Schuyler, IL  
Scott, IL

In addition, Simmetry is excluding the following area in Marion County, Missouri in and around Hannibal, Missouri as identified by the series of points set-forth below:

Marion County, MO –

<b>Longitude</b>	<b>Latitude</b>
-91.37080	39.68552
-91.37053	39.69636
-91.35955	39.70326
-91.35986	39.70923
-91.36786	39.71137
-91.37367	39.70226
-91.38964	39.71506
-91.39322	39.71204
-91.38259	39.69855
-91.38998	39.69385
-91.39370	39.69718
-91.44408	39.69724
-91.48547	39.68547
-91.37080	39.68552

Simmetry is excluding these counties or portions of counties because there are an insufficient number of cell sites in these areas to support network-based triangulation.

Dated: July 28, 2011

# **DECLARATION OF JAMES W. BROEMMER**

I, James W. Broemmer, do hereby declare under penalty of perjury the following:

I am the President of TMP Corporation d/b/a Symmetry Wireless.

I am the officer having chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the FCC's Rules.

I have read the foregoing "Exclusion Report" of TMP Corporation d/b/a Symmetry Wireless dated July 28, 2011. I have personal knowledge of the facts set forth therein, and I believe them to be true and correct.



James W. Broemmer

President

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Quincy, IL 62301

217-740-8625

July 28, 2011  
Date